

December 20, 2013

www.manainc.com

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3120 Highwoods Blvd.
Suite 100
Raleigh, NC 27604



Document Processing Desk (DCI/PRD)
Attn: Christina Scheltema
U.S. EPA (7508P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

RE: Folpet Generic Data Call-In
ID#GDCI—081601-1326

Dear Ms. Scheltema,

Makhteshim Agan of North America (MANA), Inc. is pleased to submit the enclosed 90-Day Response to the above-referenced Data Call-In. You will see that our response in Box 9 of the Requirements Status and Registrant's Response form is "2". As has been previously established, MANA and Makhteshim Chemical Works (MCW) are both wholly-owned subsidiaries of Makhteshim Agan Industries. While MCW will take the lead in generation of data, MANA is still the agent of record to the EPA for MCW, and MANA is entitled to share in the development, as well as the citation of existing data for this DCI. In support of the technical folpet registrations, the following information is included with this submission:


- Data Call in Response form
- Requirements Status and Registrant's Response form

If you need to contact me regarding this DCI, you may reach me at phone: 919-256-9337 or e-mail: kknox@manainc.com. I look forward to working with you during this review.

Best regards,

A handwritten signature in blue ink that reads "Kristen B. Knox".

Kristen B. Knox
Federal Regulatory Manager


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|--|---|---|---|--|--|--|
| United States Environmental Protection Agency Washington, DC 20460 DATA CALL-IN RESPONSE | | | | | OMB Approval 2070-0174 | |
| INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary. | | | | | | |
| 1. Company Name and Address | | 2. Case # and Name | | 3. Date and Type of DCI and Number | | |
| Makhteshim Agan of North America, Inc. 3120 Highwoods Blvd, Suite 100 Raleigh, NC 27604 | | 0630 - Folpet Chemical # and Name: 081601 Folpet | | 16-Sep-2013 Generic ID # GDCI-081601-1326 | | |
| 4. EPA Product Registration | 5. I wish to cancel this product registration voluntarily | 6. Generic Data | | 7. Product Specific Data | | |
| | | 6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below. | 6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response" | 7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response." | 7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response." | |
| 66222-126 | | | ✓ | | | |
| 8. Certification. I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative.  Federal Regulatory Manager | | | | | 9. Date December 20, 2013 | |
| 10. Name of Company Makhteshim Agan of North America, Inc. | | | | | 11. Phone Number 919-256-9337 | |

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

| | | | | | | | | | |
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| 1. Company Name and Address Makhteshim Agan of North America, Inc. 3120 Highwoods Blvd, Suite 100 Raleigh, NC 27604 | | | | 2. Case # and Name 0630 - Folpet Chemical # and Name: 081601 Folpet | | | 3. Date and Type of DCI and Number 16-Sep-2013 Generic ID # GDCI-081601-1326 | | |
| 4. Guideline Requirement Number | 5. Study Title | P R O T O C O L | Progress Reports | | | 6. Use Pattern | 7. Test Substance | 8. Time Frame (Months) | 9. Registrant Response |
| | | | 1 | 2 | 3 | | | | |

| | | | | | | | |
|----------|---|--------------|---|------------|------------|----|---|
| 875.1200 | Dermal exposure—Indoor | (16, 23, 25) | y | X,C,B,A,BB | TEP | 36 | 2 |
| 875.1400 | Inhalation exposure—indoor | (16, 23, 25) | Y | X,C,B,A,BB | TEP | 36 | 2 |
| 835.2410 | Photodegradation of parent and degradates in soil | | N | X,C,B,A,BB | TGAI | 12 | 2 |
| 835.4100 | Aerobic soil metabolism | (3, 12) | N | X,C,B,A,BB | Degr; TGAI | 24 | 2 |
| 835.4300 | Aerobic aquatic metabolism | | N | X,C,B,A,BB | TGAI | 24 | 2 |
| 835.4400 | Anaerobic aquatic metabolism | | N | X,C,B,A,BB | TGAI | 24 | 2 |
| 850.4100 | Seedling Emergence and Seedling Growth | (18, 26) | N | X,C,B,A,BB | TEP | 12 | 2 |


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|----------|---|-------------|---|------------|------|----|---|
| 850.4150 | Vegetative Vigor | (18, 26) | N | X,C,B,A,BB | TEP | 12 | 2 |
| 875.2300 | Indoor Surface Residue Dissipation | (22, 24) | N | X,C,B,A,BB | EP* | 24 | 2 |
| 850.1300 | Daphnid chronic toxicity test | (2, 6) | N | X,C,B,A,BB | Degr | 12 | 2 |
| 850.1400 | Fish early-life stage toxicity test | (1, 6, 14) | N | X,C,B,A,BB | Degr | 12 | 2 |
| 850.2100 | Avian acute oral toxicity test | (8, 13, 17) | Y | X,C,B,A,BB | TGAI | 12 | 2 |
| 850.2300 | Avian reproduction test | (8, 11) | N | X,C,B,A,BB | TGAI | 24 | 2 |
| 850.3030 | Honey bee toxicity of residues on foliage | (10, 17) | Y | X,C,B,A,BB | TEP | 12 | 2 |

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United States Environmental Protection Agency
Washington, DC 20460

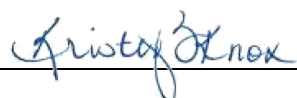
OMB Approval
2070-0174

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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|----------|---|----------------|---|------------|------|----|---|
| 870.3465 | 90-day inhalation toxicity | | N | X,C,B,A,BB | TGAI | 24 | 2 |
| 870.7800 | Immunotoxicity | (15) | N | X,C,B,A,BB | TGAI | 12 | 2 |
| 835.3110 | Ready biodegradability | (6, 7, 21) | N | X,C,B,A,BB | Degr | 12 | 2 |
| 835.3220 | Porous pot test | (6, 7, 21) | N | X,C,B,A,BB | Degr | 12 | |
| 835.3240 | Simulation Test-Aerobic Sewage Treatment (6, 7, 21) Activated Sludge | | N | X,C,B,A,BB | Degr | 12 | 2 |
| 835.3280 | Simulation Tests to Assess the Biodegradability of Chemicals | (6, 7, 21) | N | X,C,B,A,BB | Degr | 12 | 2 |
| 850.3300 | Modified Activated Sludge, Respiration Inhibition Test | (4, 7, 19, 21) | N | X,C,B,A,BB | Degr | 12 | 2 |

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|----------|--|---------|---|------------|------|----|---|
| 850.4500 | Algal Toxicity | (5, 6) | N | X,C,B,A,BB | Degr | 12 | 2 |
| 850.6100 | Environmental Chemistry Methods and Associated Independent Laboratory Validation | (9) | N | X,C,B,A,BB | Degr | 12 | 2 |
| SS-1115 | Avian Inhalation | (8, 17) | Y | X,C,B,A,BB | TGAI | 12 | 2 |

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